

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
PJETER GJONI, on behalf of himself
and all others similarly situated,

Plaintiff,

-against-

ORSID REALTY CORP., and 145 EAST 15TH
STREET TENANTS CORP., and GERARD
MOUNIC, in his individual and professional capacities,

Defendants.
-----X

Case No: 14-cv-8982
(GBD)

**AFFIDAVIT IN
SUPPORT OF COOP
DEFENDANTS'
MOTION TO DISMISS**

STATE OF NEW YORK)
):ss.
COUNTY OF NEW YORK)

JUSTINE DELAGANA-TAGLIANI, being duly sworn, deposes and says:

1. I am an employee of Defendant Orsid, the Coop's professional managing agent, and the account executive assigned to the Coop; as such I am the custodian of the Coop's corporate records.¹

2. I make this affidavit in support of the Defendants' motion to compel arbitration and dismiss the present action in order to introduce the exhibits referenced in Defendants' accompanying memorandum of law.

3. These exhibits are business records maintained by the Coop in the ordinary course of business. Based on my personal review, the following records are true and accurate copies of the original documents:

Exhibit "A" Collective Bargaining Agreement between Realty Advisory Board on Labor Relations Incorporated and Service Employees International Union, Local 32BJ, effective April 21, 2014 to April

¹ Defined terms used herein are defined within the memorandum of law filed herewith.

20, 2018, including Plaintiff's Assent to the terms of the CBA;

Exhibit "B" Collective Bargaining Agreement between Realty Advisory Board on Labor Relations Incorporated and Service Employees International Union, Local 32BJ, effective April 21, 2010 to April 20, 2014, including Plaintiff's Assent to the terms of the CBA;

Exhibit "C" Collective Bargaining Agreement between Realty Advisory Board on Labor Relations Incorporated and Service Employees International Union, Local 32BJ, effective April 21, 2006 to April 20, 2010, including Plaintiff's Assent to the terms of the CBA;

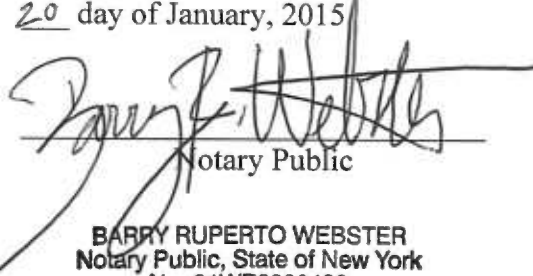
Exhibit "D" By-Laws of 145 East 15th Street Tenants Corp.;

Exhibit "E" Instant Complaint, dated November 10, 2014.

4. For the reasons discussed in detail in the accompanying memorandum of law, I respectfully request that the action be dismissed and the Plaintiff be required to arbitrate his wage dispute as contemplated and required by the Collective Bargaining Agreement.


JUSTINE DELAGANA-TAGLIANI

Sworn to before me this
20 day of January, 2015


Notary Public
BARRY RUPERTO WEBSTER
Notary Public, State of New York
No. 01WE6280480
Qualified in New York County
Commission Expires 4/29/2017